



DIAND Nunavut District
Box 100
Iqaluit, NT
XOA OHO

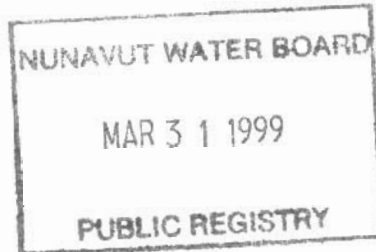
Your file Votre référence

Our file Notre référence

March 23, 1999

B9545-5-N5L3-0087

Mr. John Raycroft
Senior Administrative Officer
Town of Iqaluit
Box 460
Iqaluit, NT
XOA OHO



Dear Mr. Raycroft;

Re: **Review of 1998 Annual Report and 1998 Compliance Review**

1. The following is a summary of the review of the 1998 Annual Report prepared by the Town of Iqaluit in accordance with water licence N5L3-0087. In addition, attached is a copy of the 1998 Compliance Report. Compliance Reports are prepared on an annual basis and are used to determine how the Licensee has complied with the terms and conditions of the water licence issued to them. Where shortcomings are noted, the Licensee is expected to address these shortcomings and provide any information requested.
2. The 1998 Annual Report was found to be generally complete, with a few exceptions. See paragraphs 9 and 12 of the 1998 Compliance Report which detail 'guidelines' on how information should be provided within an Annual Report.
3. The most significant issues facing the Town of Iqaluit relate to the studies/work plans required for the Abandonment and Restoration of the West 40 and Apex dump sites and for the preparation of a long term waste management plan. *These plans have significant deficiencies and have yet to receive approval from the Nunavut Water Board (NWB) (para. 8).*
4. In the past 2 years, there have been changes made to the Operation and Maintenance (O+M) Plan for the solid waste disposal site. A new O+M Plan should be prepared and submitted to the NWB (para. 4).
5. Please advise this office if the new warning signs that Public Health had requested be placed around Lake Geraldine. Within the 1998 Annual Report, it is noted that this work was planned to take place in February, 1999 (para. 14).

.../2

6. If you have any questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Smith". The signature is fluid and cursive, with the first name "Paul" and last name "Smith" clearly distinguishable.

Paul Smith
Water Resources Officer
Nunavut District

cc. - Nunavut Water Board, Gjoa Haven
- DIAND Water Resources, YK
- MACA, Iqaluit (Doug Sitland)
- Public Health, Iqaluit, (Nicole Ritchie)

1998 COMPLIANCE REPORT

ON

CONDITIONS OF LICENCE NUMBER N5L3-0087

HELD BY THE TOWN OF IQALUIT

PREPARED BY

PAUL SMITH

INSPECTOR UNDER THE NORTHWEST TERRITORIES WATERS ACT

DIAND NWT REGION

NUNAVUT DISTRICT

IQALUIT, NT

DATE: March 11, 1999
WATER REGISTER: N5L3-0087

Town of Iqaluit
Water Licence N5L3-0087
1998 Compliance Report

1. This Licence was issued on January 1, 1996 and expired on December 31, 1998. The Licence has been extended by the Nunavut Water Board until June 30, 1999. The Licensee is permitted to use 1,100,000 cubic metres of water per year. This is the last compliance report to be prepared under this licence.

Compliance

Part B - General Conditions

2. (Item 1). The Licensee has complied with this clause. The Annual Report (dated January 11, 1999) was received by this office on March 11, 1999.
3. (Item 1a). The Licensee has reported the monthly and annual quantities of water used.
4. (Item 1b). Not applicable as the new sewage disposal facilities have not yet been constructed.
5. (Item 1c). The Licensee has provided a summary of modifications and/or major maintenance work carried out on the water supply and waste disposal facilities.
6. (Item 1d). The Licensee has provided the results of SNP sampling. However, the way in which it is presented makes it very difficult to review the data provided.
7. (Item 1e). Although the Licensee performed no A+R work in 1998, they have had A+R plans before the NWB that have twice been rejected as being incomplete/unusable. As far as this office is aware, the NWB has not set a date by which revised plans must be submitted by.
8. (Item 1f). The annual Report notes that a "Solid Waste Assessment of the Iqaluit Landfill Site" was completed and submitted. This is the "Municipality of Iqaluit Solid Waste Management Study" prepared by OM&M Trow and submitted to the NWB on August 14, 1998. The requirement for this report originates from Part D, Item 13 of the licence which states **"The Licensee shall, by January 1, 1997, submit to the Board for approval, a Waste Management Plan. The Plan shall address the long term waste management needs of the Town of Iqaluit."** The Licensee has failed to provide this plan by the deadline stated in the Licence. Likewise, the report submitted

by OM&M Trow on behalf of the Town does not, in the opinion of the Inspector, address the requirements of the Licence.

Note: An omission of the 1998 Annual Report relates to the provision of the Spill Contingency Plan prepared by Dillon Consulting Ltd. and submitted in June of 1998. Part D, Item 10 of the licence specifies the requirement for this plan and states that it was to have been submitted by June 30, 1996.

9. (Item 1g). The Licensee has provided a list of 6 unauthorized discharges. All spills involved the release of sewage. For future reference, these spills should be referenced by the Spill Number issued by the NWT Spill Line (the information contained in the Annual Report uses only date references).
10. (Item 1h). The Licensee has provided information on new initiatives at the waste disposal site. The O+M plan should be officially modified to reflect these improvements.
11. (Item 1i). Not applicable as the Board did not request any additional information.
12. (Item 2). The Licensee has generally complied in full with this section. Where samples have not been collected, an explanation has been offered. As noted above, the most significant concern is the way in which the data is presented. An example of an 'acceptable' format is appended to this report.
12. (Item 4). The Licensee produces more treated water than it can account using metered utilidor and trucked services. Last year the Licensee reported that the variance averages 20% over the year. Continued efforts have reduced this unaccounted value to 11%.
13. (Item 5). This condition has been met.
14. (Item 6). The Licensee has complied with this condition. Public Health had requested more warning signs around the perimeter of Lake Geraldine. Within the Annual Report, the Licensee indicated that this was to be done in February, 1999 (by ski-doo).
15. (Item 7). The Licensee has complied with this condition.

Part C - Conditions Applying to Water Supply

16. (Item 1). The Licensee obtained all water from Lake Geraldine. The Licensee is in compliance with this section.

18. (Item 2). The permitted amount of water to be used is 1,100,000 cubic metres per year. The Licensee reported using 391,555 m³ - well within their licence limits (and less than last year).

Part D - Conditions Applying to Waste Disposal

19. (Item 1). The Licensee is in compliance with this section.
20. (Item 2). The Licensee met the effluent discharge requirements during open water periods for all regulated parameters. As noted in the Annual Report, July samples were not received by the lab within the 24 hour window and no results could be obtained. However, given that all discharge limits were met for the months preceding and following July were within the licence limits, it is reasonable to assume that July would have also been within licence limits. Problems identified in past years with the reporting of faecal coliform levels have been resolved as the Town now uses a different lab.
21. (Item 3). Although the Licensee has not been able to install a fixed reference point in the open part of the lagoon, from the random checks that have been made, the Licensee appears to be having more success keeping the lagoon level in excess of the required 1.0 metre freeboard. In the fall there was once again a 'tea' coloured permeate coming thorough the berm. The accumulation did not appear to be as heavy as in the fall of 1997. As it stands now, the new sewage treatment plant will be constructed during the summer and fall of 1999. Decommissioning of the lagoon could foreseeably take place during the summer of 2000.
22. (Item 4). As noted above, the Licensee has had more success in maintaining freeboard levels. As such, the lagoon is being maintained in a manner that is unlikely to prevent structural failure.
23. (Item 5). The Licensee has operated the lagoon facilities to the satisfaction of the Inspector.
24. (Item 6). This clause no longer has an application within this licence.
25. (Item 8). This clause no longer has an application within this licence.
26. (Item 9). No longer applicable.

27. (Item 10). As noted in the 1997 Compliance Report, the Licensee has failed to meet this condition. The Spill Contingency Plan, which was due for submission by June 30, 1996. The Licensee submitted this report in June of 1998. The Town did not request an extension to meet this deadline.
28. (Item 12). The Licensee has met this condition. All solid wastes have been disposed of at the Solid Waste Disposal Facility.
29. (Item 13). As noted in the 1997 Compliance Report, the Licensee failed to meet this condition in that the Waste Management Plan was due to be submitted by January 1, 1997 but was not submitted until August, 1998. The Town did not request an extension to meet this deadline. As discussed above in paragraph 8, the scope of the report is misdirected.

Part E - Conditions Applying to Modifications

30. (Items 1-2). The Licensee is in compliance with these 2 sections.
31. (Item 3). Not applicable at this time.

Part F: Conditions Applying to Abandonment and Restoration

32. (Item 1). Not applicable at this time.
33. (Items 3 and 5). The Licensee has now twice submitted an A+R plan for Site 4 in the West 40 and Apex waste disposal sites, and both times the NWB has rejected the proposed plans as being undeveloped. The Licensee's contractor (OM&M in this case) has failed to produce plans that can be used to carry out this work.

Part G: Conditions Applying to Construction

34. (Items 1+2). The only construction that was carried out this past year was at the direction of the Inspector. Settling and erosion in the northeast corner of the solid waste disposal site was allowing water from within the facility to drain into the by-pass drainage path. The result was that there was never any water to be sampled at SNP 0087-7. The Licensee details and provides and a sketch of the work carried out to correct the situation within the Annual Report.

Part H: Conditions Applying to Operation and Maintenance

- 35. (Item 1). The Licensee has generally met this condition. A more detailed review will be carried out for the licence renewal process.
- 36. (Item 2). The Licensee details a new handling procedure for neutralizing battery acid obtained from lead-acid batteries. Further, the Licensee states that a program to recycle copper, bronze and aluminum has been started.
- 37. (Item 3). Not applicable at this time.

Surveillance Network Program

Part B - Sampling and Analysis Requirements

- 38. (Item 1). The Licensee has complied with this section.
- 39. (Item 2). The Licensee has complied with this section. When sampling has not been carried out, an explanation has been provided.
- 40. (Item 3). The Licensee has complied with this section.
- 41. (Items 4 and 5). The Licensee now uses the services of Taiga Environmental, in Yellowknife. As such, all concerns related to data validity has been addressed.

Part C - Flow Measurement Requirements

- 42. (Item 1). The Licensee has complied with this section.

Conclusions

43. The Licensee has generally complied with their water licence. The deficiencies that remain to be addressed are:

- Paragraph 6. For future reference, the Licensee is requested to use a format that allows for the easy examination of SNP data (see samples appended).

- Paragraph 8. The Licensee failed to submit the long term waste management plan within the time frame specified by the licence. Likewise, the plan that was submitted has not, in the opinion of the Inspector, fulfilled the requirements of the water licence.

- Paragraph 8. The Spill Contingency Plan was to have been submitted in June of 1996. It was submitted 2 years late.

- Paragraph 9. For future reference, the Licensee is requested to use the assigned spill report numbers when listing spills per Part B, Item 1g of the licence.

Paul Smith
Water Resources Officer
Inspector under the NWT Waters Act
Nunavut District